

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

**ROCCO CIOFOLETTI, et al., on behalf
of themselves and all others similarly
situated,**

Plaintiffs,

v.

**SECURIAN FINANCIAL GROUP, INC.,
et al.,**

Defendants.

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CASE NO. 0:18-CV-03025-JNE-ECW

MOTION TO EXTEND TIME

Specially appearing defendant Shurwest, LLC (“Shurwest”) files this motion to extend time and respectfully states:

Shurwest’s deadline to file its motion to dismiss Plaintiff’s complaint is Friday, March 27, 2020. *See* Docket No. 129. The COVID-19 pandemic presents significant difficulties to both Shurwest and its counsel in the preparation of that motion. Specifically, Shurwest is maintaining only business-critical operations. And Shurwest’s Texas-based counsel are under a shelter-in-place order, making substantive work exceedingly difficult. Shurwest therefore respectfully requests that the Court extend its deadline by 30 days, to April 27, 2020.

Shurwest requests that the Court grant this motion without a hearing. Alternatively, Shurwest requests that the Court hold a telephonic hearing at the Court’s earliest convenience.

Pursuant to LR 7.1, Shurwest’s counsel attempted to confer with counsel for Plaintiffs, but received no response. Lead counsel for Plaintiffs is also subject to a shelter-in-place order, and may therefore be unable to respond. Shurwest’s counsel is uncertain as to the status of the other

Plaintiffs' counsel. Shurwest's counsel will supplement this statement pursuant to LR 7.1(a)(1) if he is able to reach any of Plaintiffs' counsel.

Dated: February 23, 2020

**ANTHONY OSTLUND
BAER & LOUWAGIE P.A.**

Brooke D. Anthony (#0387559)
Philip J. Kaplan (#0389351)
3600 Wells Fargo Center
90 South Seventh Street
Minneapolis, Minnesota 55402
Tel: (612) 349-6969
Fax: (612) 349-6996
Email: banthony@anthonyostlund.com
pkaplan@anthonyostlund.com

and

DLA PIPER LLP (US)

s/ Jason M. Hopkins

Jason S. Lewis
(Texas No. 24007551 *pro hac vice*)
Jason M. Hopkins
(Texas No. 24059969 *pro hac vice*)
1900 N. Pearl St., Ste. 2200
Dallas, Texas 75201
Tel: (214) 743-4546
Fax: (972) 813-6267
Email: Jason.Lewis@dlapiper.com
Jason.Hopkins@dlapiper.com

Attorneys for Defendant Shurwest, LLC

CERTIFICATE OF SERVICE

I certify that on March 23, 2020, I served the foregoing motion on all counsel of record via the Court's CM/ECF system.

/s/ Jason M. Hopkins

Jason M. Hopkins